

Exhibit A

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

-----X
AGNES LOUIS,

Plaintiff,

-against-

MACY'S INC., MACY'S RETAIL HOLDINGS, INC.,
and MACY'S EAST, INC.,

Defendants.
-----X

Index No.:

Plaintiff designates Queens
County as place of trial.

SUMMONS

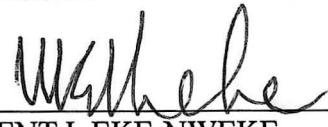
The basis of venue is
Plaintiff's residence. Plaintiff
resides at 522 Jefferson Ave.,
Brooklyn, NY

To the above named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to
serve a copy of your answer, or, if the complaint is not served with this summons, to serve a notice
of appearance, on the Plaintiff's Attorney(s) within 20 days after the service of this summons,
exclusive of the day of service (or within 30 days after the service is complete if this summons is not
personally delivered to you within the State of New York); and in case of your failure to appear or
answer, judgement will be taken against you by default for the relief demanded in the complaint.

Dated: Brooklyn, New York
July 9, 2021

Yours, etc.,
Law Office of Vincent I. Eke-Nweke, P.C.
Attorney for Plaintiff

By: 
VINCENT I. EKE-NWEKE
498 Atlantic Avenue
Brooklyn, New York 11217
(718) 852-8300

Defendants' Addresses:

MACY'S INC.,
C/O NYS Secretary of State

MACY'S RETAIL HOLDINGS, INC.,
C/O NYS Secretary of State

MACY'S EAST, INC
C/O NYS Secretary of State

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

-----X Index No.:
AGNES LOUIS,

Plaintiff,

-against-

VERIFIED COMPLAINT

MACY'S INC., MACY'S RETAIL HOLDINGS, INC.,
and MACY'S EAST, INC.,

Defendants.
-----X

Plaintiff, AGNES LOUIS, by her attorney, LAW OFFICE OF VINCENT I. EKE-NWEKE, P.C., complaining of the defendants MACY'S INC, MACY'S RETAIL HOLDINGS, INC., and MACY'S EAST, INC., (collectively "defendants" or "MACY'S") respectfully shows to this Court and alleges, upon information and belief, as follows:

FOR A FIRST CAUSE OF ACTION

FIRST: That at all times herein mentioned, plaintiff was a resident of the County of Kings, City and State of New York.

SECOND: That at all times herein mentioned, defendant MACY'S INC., was and still is a foreign business corporation incorporated under the laws of the State of Delaware and actively carrying on business within the City and State of New York. Said Defendant owns, controls, manages and/or operates a department store located at 422 Fulton Street, Brooklyn, County of Kings, City and State of New York.

THIRD: That at all times herein mentioned, defendant MACY'S RETAIL HOLDINGS, INC., was and still is a foreign business corporation incorporated under the laws of the State of Delaware and actively carrying on business within the City and State of New York. Said Defendant owns, controls, manages and/or operates a department store located at 422 Fulton Street, Brooklyn, County of Kings, City and State of New York.

FOURTH: That at all times herein mentioned, defendant MACY'S EAST, INC., was and still is a foreign business corporation incorporated under the laws of the State of Delaware and actively carrying on business within the City and State of New York. Said Defendant owns, controls, manages and/or operates a department store located at 422 Fulton Street, Brooklyn, County of Kings, City and State of New York.

FIFTH: That at all times herein mentioned, defendant MACY'S INC., is the holding company, parent, affiliate, division and/or alter ego of Defendants MACY'S RETAIL HOLDINGS, INC., and MACY'S EAST, INC., and exercised complete dominion and control over said defendants. All defendants act together or jointly as one entity, are held out to the public as one entity and are treated as one entity known as and referred to as MACY'S.

SIXTH: That at all times herein mentioned, MACY'S owned, controlled, managed and/or operated several departmental stores at various locations within the City and State of New York, including but not limited to the store located at 422 Fulton Street, Brooklyn, New York, where assorted items and merchandise were sold or marketed to the general public.

SEVENTH: That at all times herein mentioned, MACY'S, owned, controlled, managed and operated a certain department store located at 422 Fulton Street, Brooklyn, New York, to which the general public was invited for the purpose of obtaining assorted items or merchandise for a compensation to be paid MACY'S.

EIGHT: That on or about May 23, 2021, at approximately 12:35 p.m., plaintiff was a lawful patron at the MACY'S department store located at 422 Fulton Street, Brooklyn, New York, and was in a checkout area on the third floor, when she slipped and fell on liquid substance located on the floor, thereby sustaining serious injury.

NINTH: That the slip and fall and injuries to plaintiff were caused solely as a result of the negligence of MACY'S, their officers, servants, agents, owners and employees and without concurrent negligence on the part of the plaintiff.

ELEVENTH: That defendants, their officers, servants, agents, owners and employees were negligent in the ownership, operation, maintenance, control, repair and inspection of the aforesaid department store, in allowing the liquid substance to remain on the floor without any warning or warning device, in maintaining the area in question in a dangerous or defective condition and in failing to warn persons in the store of its dangerous condition.

TWELFTH: That at all relevant times, defendants had actual and/or constructive notice of the liquid substance and/or dangerous condition of the area where plaintiff slipped and fell.

THIRTEENTH: That solely by and as a result of the negligence of MACY'S, plaintiff sustained severe injuries to her whole body, including but not limited to her right shoulder, arm, elbow, thigh and buttock as well as her right knee and ankle.

FOURTEENTH: That plaintiff suffered a severe shock to her nervous system. Her general health has been damaged, and the functions of her body have been greatly impaired.

FIFTEENTH: That plaintiff is informed and believes that her injuries are of a permanent nature.

SIXTEENTH: That plaintiff has expended and will necessarily be put to further expenses for medical services.

SEVENTEENTH: That one of the exceptions enumerated in Article 16 of the CPLR is applicable herein.

EIGHTEENTH: That the amount of damages sought in this action exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE, plaintiff demands judgment against the defendants jointly and severally together with the costs and disbursements of this action.

Dated: Brooklyn, New York
July 9, 2021

Yours, etc.,
Law Office of Vincent I. Eke-Nweke, P.C.
Attorney for Plaintiff

By: _____



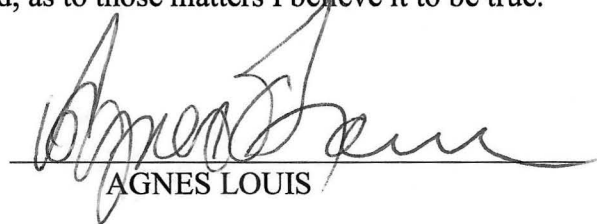
VINCENT I. EKE-NWEKE
498 Atlantic Avenue
Brooklyn, New York 11217
(718) 852-8300

VERIFICATION

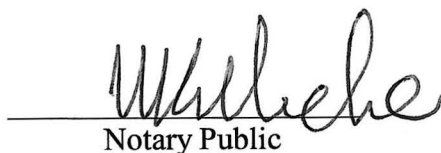
STATE OF NEW YORK)
 :
COUNTY OF KINGS) ss.:

AGNES LOUIS, being duly sworn, deposes and says:

I am the Plaintiff in the within action, I have read the forgoing COMPLAINT and know the contents thereof, the same is true to my own knowledge except as to the matters therein stated to be alleged upon information and belief; and, as to those matters I believe it to be true.


AGNES LOUIS

Sworn to before me this
9th day of July 2021


Notary Public

VINCENT I. EKE-NWEKE
Notary Public, State of New York
Qualified in Richmond County
No. 02EK5088084
My Comm. Expires 04-18-2022

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

-----X
AGNES LOUIS,

Plaintiff,

-against-

MACY'S INC., MACY'S RETAIL HOLDINGS, INC.,
and MACY'S EAST, INC.,

Defendants.
-----X

Index No.:


**CERTIFICATION
PURSUANT TO
CPLR § 130-1.1 a(b)**

VINCENT I. EKE-NWEKE, an attorney duly admitted to practice law before the courts of this State, states the following to be true under penalties of perjury:

I hereby certify pursuant to 22 NYCRR Section 130-1.1a(b) that to the best of my knowledge, information and belief, formed after an inquiry reasonable under the circumstances, the presentation of the annexed SUMMONS and VERIFIED COMPLAINT or the contentions therein are not frivolous as defined in 22 NYCRR Section 130-1.1(c).

Dated: July 9, 2021
Brooklyn, New York

Law Office of Vincent I. Eke-Nweke, P.C.

By: 
VINCENT I. EKE-NWEKE
498 Atlantic Avenue
Brooklyn, New York 11217
(718) 852-8300

Index No.: _____

Year: _____

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF KINGS**

AGNES LOUIS,

Plaintiff,

-against-

**MACY'S INC, MACY'S RETAIL HOLDINGS, INC.,
and MACY'S EAST, INC.,**

Defendants,

SUMMONS AND VERIFIED COMPLAINT

LAW OFFICE OF VINCENT I. EKE-NWEKE, P.C.

Attorney(s) for Plaintiff(s)

498 Atlantic Avenue

Brooklyn, New York 11217-1813

(718) 852-8300

To:

**Service of a copy of the within
is hereby admitted.**

Dated:..... 20__

Attorneys for Defendant(s)
